

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

CENTER FOR BIOLOGICAL DIVERSITY,

Plaintiff,

v.

U.S. DEPARTMENT OF INTERIOR, *et al.*,

Defendants.

Case No. 1:25-cv-00612-RDM

JOINT STATUS REPORT

In accordance with the Court's directive at the August 26, 2025 hearing, the parties respectfully submit this joint status report that provides a production schedule for the FOIA requests underlying Count Three of the amended complaint.

Defendants subject to the FOIA requests have agreed to produce to Plaintiff all non-exempt responsive records not still undergoing consultation with non-party federal entities, together with a draft Vaughn Index, according to the following schedule¹:

- Department of Agriculture: October 17, 2025
- Environmental Protection Agency: October 31, 2025
- Department of Commerce on behalf of the National Oceanic and Atmospheric Administration: October 17, 2025
- Department of Interior: October 17, 2025

¹ Although Defendants do not control consultation with non-defendant federal entities, the dates reflect Defendants' reasonable belief about when they can complete full production, including records subject to consultation, and complete the draft Vaughn indices. If any records are still undergoing consultation by these dates, Defendants will inform Plaintiff when they anticipate the consultation process being complete.

Defendants subject to the FOIA requests agree to release to Plaintiff all non-exempt, responsive records that are not in consultation/final review as soon as they are ready for production on or before September 26, 2025 and again on the final date of production as specified herein, even if completion of other records undergoing consultation/final review is still ongoing. Defendants further agree to produce all non-exempt records to Plaintiff as soon as consultations and final review of the records are complete, even if the preparation of the Vaughn index for withheld materials will take additional time.

The parties will continue to confer as necessary to ensure that production proceeds in accordance with this schedule and will promptly notify the Court if any adjustments are required.

DATED: August 29, 2025

Respectfully submitted,

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